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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,	:	Crim. No. 23-99-1(LJL)
	:	
v.	:	Hon. Lewis J. Liman, U.S.D.J.
	:	
KEVIN PEREZ	:	
	:	
Defendant.	:	
	:	
	:	

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**NOTICE OF MOTION TO SEAL A FILING**

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TO: Michael R. Herman  
Assistant United States Attorney  
One Saint Andrew's Plaza  
New York, New York 10007

James Alan Ligtenberg  
Assistant United States Attorney  
One Saint Andrew's Plaza  
New York, New York 10007


Patrick Ryan Moroney  
Assistant United States Attorney  
One Saint Andrew's Plaza  
New York, New York 10007

**PLEASE TAKE NOTICE** that Pursuant to Rule 49.1(d) of the Federal Rules of Criminal Procedure, MICHAEL T. ASHLEY hereby moves this Court for an Order for sealing Exhibit A appended hereto.

**PLEASE TAKE FURTHER NOTICE** that movant shall rely upon the Rule 49.1 of the Federal Rules of Criminal Procedure and well established precedent to support the relief requested herein.

**The Law Office of Thomas R. Ashley**  
*Attorneys for Defendant Kevin Perez*

By: \_\_\_\_\_



Michael T. Ashley

Dated: January 7, 2025

**CERTIFICATE OF SERVICE**

I, MICHAEL T. ASHLEY, of full age hereby certify and say:

1. I am an attorney with the Law Office of Thomas R. Ashley.

2. On this date, I caused a copy of this Notice of Motion and appended exhibit to be served via CM/ECF on all counsel of record who have appeared in this case.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

**The Law Office of Thomas R. Ashley**  
*Attorneys for Defendant Kevin Perez*

By: \_\_\_\_\_

Michael T. Ashley

A handwritten signature in blue ink, appearing to read 'M. Ashley', is written over a horizontal line.

Dated: January 7, 2025